

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIRIACO PUCILLO)	
Plaintiff)	
)	
v.)	C.A. NO. 03-CV-12359 MLW
)	
VALMET CONVERTING, INC.)	
Defendants)	

**PLAINTIFF'S UNOPPOSED MOTION TO EXTEND THE DEADLINE
FOR THE FILING OF MOTION TO AMEND COMPLAINT**

Now comes the Plaintiff in the above entitled action and respectfully requests that the deadline by which the Plaintiff file his Motion to Amend the Complaint be extended from June 30, 2006 to July 5, 2006, or such other date as determined by the Court.

In support of this Motion, the Plaintiff states that it was not possible to file the Motion on June 30, 2006, due to a problem with the electronic filing system at the Federal District Court. Specifically, there was a problem with Plaintiff's counsel's password.

Counsel on behalf of the Defendant, Valmet Converting, Inc. was made aware of the problem on June 30, 2006, and does not oppose this Motion.

Respectfully Submitted,

/s/ Maureen Counihan
Maureen Counihan, Esq. (B.B.O. #549098)
Law Offices of Maureen Counihan, P.C.
67 South Bedford Street
Suite 400 West
Burlington, MA 01803
(781) 229-5884

Attorney For Plaintiff Ciriaco Pucillo

Dated: July 5, 2006